

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA)

v.)

Case No. 5:25-MJ-36 (MJK)

ARIF KARICIC)

Defendant(s))

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of February 11, 2025 in the county of Onondaga in the Northern District of New York the defendant violated:

Code Section
18 U.S.C. § 2252A(a)(2)(A)

Offense Description
Distribution of Child Pornography

This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

Matthew Haddad, Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: February 12, 2025



Judge's signature

City and State: Syracuse, New York

Hon. Mitchell J. Katz, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

**AFFIDAVIT IN SUPPORT
OF A CRIMINAL COMPLAINT**

I, Matthew Haddad, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging Arif KARICIC (“KARICIC”) with a violation of Title 18, United States Code, Section 2252A(a)(2)(A) (distribution of child pornography), as more fully described below.

2. I am a Special Agent employed by the United States Department of Justice, Federal Bureau of Investigation (“FBI”), and as such I am an “investigative or law enforcement officer” of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Chapter 63. I have been a Special Agent with the FBI since March 2020. I am currently assigned to the FBI’s Albany Division where I investigate all federal criminal violations. I have participated in investigations of persons suspected of violating federal child pornography laws, including Title 18, United States Code, Section 2252A, including preparing and executing search warrants in child pornography and child exploitation investigations. I have received training in child sexual exploitation and have had the opportunity to observe and review examples of child pornography in all forms of media including computer media.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. Rather, I have set forth only those facts that I

believe are necessary to establish probable cause to believe that KARICIC has violated Title 18, United States Code, Section 2252A(a)(2)(A) (distribution of child pornography).

PROBABLE CAUSE

4. Between the months of November and December 2024, an FBI Online Covert Employee (“OCE”), operating out of the Northern Virginia Resident Agency of the FBI Child Exploitation Task Force, participated in various Groups believed to be involved in the dissemination of child sexual abuse material on the Application A. Application A is a commonly used social media application. Numerous Groups on this app are known to the FBI as a place where users meet, discuss, and trade original images of underage children and links containing child sexual abuse material. On November 21, 2024, the OCE contacted Application A user “Battman8739,” after observing that “Battman8739” was an active participant in a Group called “#openfunparents”. Law enforcement later established that “Battman8739” was Arif KARICIC.

5. “Battman8739” and the OCE began communicating using Application A. “Battman8739” provided the OCE with personal descriptors that matched KARICIC’s physical characteristics, and told the OCE that his preferred age for a sexual partner was 14 years old. “Battman8739” also told the OCE that he was a single father, consistent with KARICIC being a single father. “Battman8739” proposed that he and the OCE begin communicating via native text messaging and sent the OCE a message via 315-XXX-XXXX (the “315 Number”). Among other messages, the 315 Number sent the OCE a text message identifying the user as “Ari” (which is short for KARICIC’s first name).

6. Subsequent investigation confirmed the 315 Number’s user as Arif KARICIC. According to information provided by AT&T to the FBI pursuant to a subpoena, KARICIC’s

father was the accountholder associated with the 315 Number, with “Arif Karicic” listed as the 315 Number’s specific user. The account’s listed address was a Syracuse, New York, residential address where, according to a review of publicly available information and law enforcement records, KARICIC and KARICIC’s father reside.

7. During his text message conversation with the OCE, KARICIC reiterated his sexual attraction to young girls. On November 22, 2024, KARICIC distributed a child pornography video file to the OCE via text message. The video is approximately 12 seconds in length and depicts an adult male rubbing the tip of his erect penis on the anus of a face-down adolescent female child. On November 23, 2024, KARICIC distributed a second child pornography file to the OCE. This file is an image depicting a face-down, adolescent female child exposing her anus and vagina. On November 24, 2024, KARICIC sent the OCE a third child pornography file, this time a 33-second video depicting two prepubescent female children, sitting next to each other with their underwear moved to the side, exposing their genitals. The two children touch each other’s vaginal area.

8. Throughout the course of the conversations with KARICIC, the OCE claimed she was sexually active with her purported 8-year-old child. On November 25, 2024, KARICIC responded, “Thats so hott and sexy that you play with her id love to see a clip of you touching her She watches porno with you or no”. KARICIC then sent the OCE a 3-second video of a prepubescent female child sucking on the breast of what appears to be an adolescent female. After the OCE told KARICIC that she would not video the purported 8-year-old child, KARICIC stated, “Make a sneaky vid of her touching your cunt: no faces nothing just her hands and your cunt playing”.

9. On December 5, 2024, KARICIC told the OCE that he was in contact with a third party “friend” who was regularly sexually abusing a 14-year-old girl. KARICIC told the OCE that KARICIC had also sexually abused the 14-year-old. KARICIC alleged that his friend showed KARICIC “a lot of pornos he’s made” with the 14-year-old. KARICIC claimed that he and his friend had watched child sexual abuse material together, masturbated together, and each had sex with the 14-year-old. KARICIC claimed to have media depicting KARICIC’s sexual abuse of the 14-year-old, but would not share the media with the OCE.

10. On February 12, 2025, your affiant, together with other federal and local law enforcement personnel, executed a federal search warrant for KARICIC’s Syracuse residence, vehicle, and person. KARICIC was encountered at his workplace and agreed to travel with your affiant and other law enforcement officials (collectively, the “interviewing Agents”) to the Syracuse, New York, FBI office to be interviewed. At the outset of the recorded interview at the FBI office, KARICIC was provided his *Miranda* warning. KARICIC indicated he understood his rights and agreed to speak with interviewing Agents. During the interview, KARICIC admitted to distributing and receiving child pornography on Application A on multiple occasions during the past several months. KARICIC showed the interviewing Agents his mobile phone, an Apple iPhone, and provided interviewing Agents with the iPhone’s PIN code. Interviewing Agents confirmed the iPhone utilized the 315 Number used to distribute child pornography to the OCE. Application A was not installed on the iPhone, and KARICIC told interviewing Agents he had deleted the application a few days prior.

11. During the interview, KARICIC confirmed that he was the iPhone’s and 315 Number’s user and operator, and that he had utilized the iPhone and the 315 Number to conduct

his child pornography-related activity. KARICIC also admitted he was the sole user and operator of Application A accounts that had been previously identified by investigators as having likely been used to distribute child sexual abuse material. The suspect Application A accounts acknowledged by KARICIC include accounts bearing the usernames “Batman8739” (the account used to communicate with the OCE), “KKaattee213”, “AshleyMayja1286738”, “jennyjamkitten7528” and “ordinarydadlords86284”.

12. KARICIC showed interviewing Agents that Application B, a telecommunications and filesharing application, was installed on the iPhone. Upon opening Application B, interviewing Agents confirmed Application B was associated with the 315 Number and bore account username “oralefsh.78”. Agents identified a conversation on Application B between “oralefsh.78” and another Application B user wherein, on February 11, 2025, KARICIC distributed six videos constituting child pornography to the other user. The videos included—

- a. A video, approximately 38 seconds in duration, depicting an approximately 8-year-old prepubescent female being vaginally penetrated by an adult male’s penis;
- b. A video, approximately 27 seconds in duration, depicting an approximately 6-year-old prepubescent female being vaginally penetrated by an adult male’s penis; and
- c. A video, approximately 1 minute and 23 seconds in duration, depicting an approximately 10-year-old prepubescent female being vaginally penetrated by an adult male’s penis.

CONCLUSION

13. Based on the aforementioned facts, there is probable cause to believe Arif KARICIC has violated 18 U.S.C. § 2252A(a)(2)(A) (distribution of child pornography). I

respectfully request that the Court issue the proposed criminal complaint pursuant to this violation of federal law.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

Matthew Haddad

Matthew Haddad, Special Agent
Federal Bureau of Investigation

I, the Honorable Mitchell J. Katz, United States Magistrate Judge, hereby acknowledge that this affidavit was attested to by the affiant by telephone on February 12, 2025, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Hon. Mitchell J. Katz
United States Magistrate Judge